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Cc: [Antonio Romanucci](#); [Bhavani Raveendran](#); [Sarah Raisch](#); [Sam Harton](#); [Mirena Fontana](#); [Amanda Marini](#); [Kaitlyn Boelter-Eberhardt](#)
Subject: Regarding: Nichols, Tyre: Request for a "Meet and Confer" attendant to discovery and depositions.
Date: Tuesday, February 20, 2024 4:41:18 PM
Attachments: [image001.png](#)
[image002.png](#)

Good afternoon, everyone:

I hope this correspondence receives you well. My name is Javier Rodriguez, Jr., and I am one of the attorneys assigned to this matter from Romanucci & Blandin, LLC on behalf of the Plaintiff RowVaughn Wells. Myself, partner Bhavani K. Raveendran, and partner Antonio M. Romanucci of my office are needing to conduct a conference call with all members of counsel in order to discuss, *inter alia*, the following:

- **Length of time (in hours) required to conduct Rule 30(b)(6) depositions in this matter (including the necessity of a motion).**
- **Length of time (in hours) required to conduct depositions of what Plaintiff's counsel will designate as either "apex" or "Class A" deponents, including, but not limited to, named Defendants and supervisors, for example.**
- **Number of depositions to be allotted to counsel for the Plaintiff (including the necessity of a motion).**
- **Entry of a protective order.**
- **Preliminary deposition availability, on the part of Plaintiff's counsel, for the depositions of Defendant Preston Hemphill, Defendant DeWayne Smith, and Defendant Chief Cerelyn J. Davis.**

Would the members of counsel (or at least one representative for each party) happen to be available during any of the enumerated timeframes below?

Date of Plaintiff's counsel's availability.	Time(s) of Plaintiff's counsel availability.
Thursday, February 22, 2024	8:00 AM CT to 8:45 AM CT
Thursday, February 22, 2024	3:30 PM CT to 4:30 PM CT
Monday, February 26, 2024	10:15 AM CT to 10:45 AM CT
Monday, February 26, 2024	12:45 PM CT to 1:15 PM CT
Tuesday, February 27, 2024	8:00 AM CT to 8:45 AM CT

If so, I would recommend utilizing the following conference call line: +1 (562) 766-7321.

I would appreciate a response to this message by this time tomorrow afternoon. Thank you.

Respectfully yours,

Javier Rodriguez, Jr.

Attorney

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